

## **EXHIBIT B**

**U.S. Patent No. 7,590,636 – McAfee, LLC**

**Claims 4, 5, 8, and 9**

Gravel Rating Systems (“Gravel”) provides evidence of infringement of claim 1 of U.S. Patent No. 7,590,636 (hereinafter “the ’636 patent”) by McAfee, LLC (“McAfee” or “Defendant”). In support thereof, Gravel provides the following claim charts.

“Accused Instrumentalities” as used herein refers to at least methods practiced on Defendant’s website and/or computer systems hosting Defendant’s website, wherein user comments and ratings were collected and stored regarding products and services that McAfee has sold, offered for sale, made, used, provided and/or caused to be used by others, which by way of example include such websites and/or systems relating to such products and services (*see, e.g.*, [https://community.mcafee.com/t5/forums/searchpage/tab/message?filter=acceptedSolutions,solvedThreads&solution=true&advanced=true&solved=true&sort\\_by=-topicKudosCount&collapse\\_discussion=true&search\\_type=thread](https://community.mcafee.com/t5/forums/searchpage/tab/message?filter=acceptedSolutions,solvedThreads&solution=true&advanced=true&solved=true&sort_by=-topicKudosCount&collapse_discussion=true&search_type=thread)) (the “Accused Instrumentalities”). These claim charts demonstrate Defendant’s infringement, and provide notice of such infringement, by comparing each element of the asserted claims to corresponding components, aspects, and/or features of the Accused Instrumentalities. These claim charts are not intended to constitute an expert report on infringement. These claim charts include information provided by way of example, and not by way of limitation.

The analysis set forth below is based only upon information from publicly available resources regarding the Accused Instrumentalities, as Defendant has not yet provided any non-public information. An analysis of Defendant’s (or other third parties’) technical documentation and/or software source code may assist in fully identifying all infringing features and functionality. Accordingly, Gravel reserves the right to supplement this infringement analysis once such information is made available to Gravel. Furthermore, Gravel reserves the right to revise this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claims.

Unless otherwise noted, Gravel contends that Defendant directly infringed at least claims 4-5 and 8-9 of the ’636 patent in violation of 35 U.S.C. § 271(a) by selling, offering to sell, making, using, causing to be used and/or importing the Accused Instrumentalities. The following exemplary analysis demonstrates that infringement. A comparison of the Accused Instrumentalities to claim 1 of the ’636 patent is also provided because each of claims 4-5 and 8-9 depends therefrom.

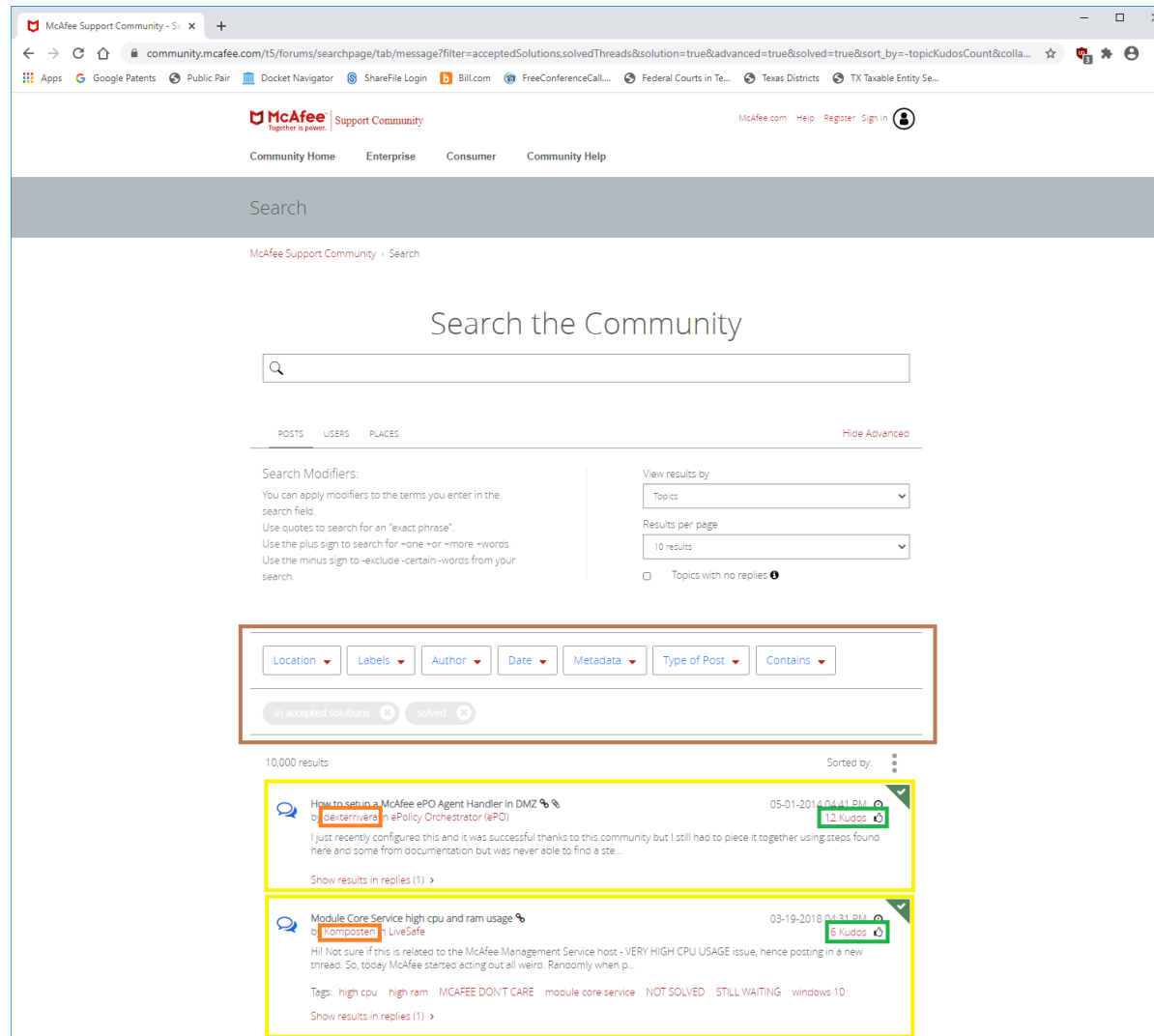
Unless otherwise noted, Gravel believes and contends that each element of each claim asserted herein is literally met through Defendant’s provision of the Accused Instrumentalities. However, to the extent that Defendant attempts to allege that any asserted claim element is not literally met, Gravel believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Accused Instrumentalities, Gravel did not identify any substantial differences between the elements of the patent claims and the corresponding features of the Accused Instrumentalities, as set forth herein. In each instance, the identified feature of the Accused Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

To the extent the chart of an asserted claim relies on evidence about certain specifically-identified Accused Instrumentalities, Gravel asserts that, on information and belief, any similarly-functioning instrumentalities also infringes the charted claim. Gravel reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by Defendant. Gravel also reserves the right to amend

# GRAVEL RATING SYSTEMS'S ANALYSIS OF INFRINGEMENT

this infringement analysis by citing other claims of the '636 patent, not listed in the claim chart, that are infringed by the Accused Instrumentalities. Gravel further reserves the right to amend this infringement analysis by adding, subtracting, or otherwise modifying content in the "Accused Instrumentalities" column of each chart.

The following screenshot(s) is representative of websites hosted by Defendant that host user forums.



[https://community.mcafee.com/t5/forums/searchpage/tab/message?filter=acceptedSolutions,solvedThreads&solution=true&advanced=true&solved=true&sort\\_by=-topicKudosCount&collapse\\_discussion=true&search\\_type=thread](https://community.mcafee.com/t5/forums/searchpage/tab/message?filter=acceptedSolutions,solvedThreads&solution=true&advanced=true&solved=true&sort_by=-topicKudosCount&collapse_discussion=true&search_type=thread)

McAfee Support Community - Search

community.mcafee.com/t5/forums/searchpage/tab/message?filter=acceptedSolutions,solvedThreads&solution=true&advanced=true&solved=true&sort\_by=-...

McAfee Support Community

Community Home Enterprise Consumer Community Help

Search

McAfee Support Community > Search

### Search the Community

Q |

POSTS USERS PLACES Hide Advanced

Search Modifiers:

You can apply modifiers to the terms you enter in the search field.

Use quotes to search for an "exact phrase".

Use the plus sign to search for -one -or -more -words.

Use the minus sign to -exclude -certain -words from your search.

View results by: Topics

Results per page: 10 results

☐ Topics with no replies

Location Labels Author Date Metadata Type of Post Contains

in accepted solutions solved

10,000 results

Sorted by: Date Views Kudos (selected) Replies Best Match

05-01-20 How to setup a McAfee ePO Agent Handler in DMZ by dexterniversa in ePolicy Orchestrator (ePO)

I just recently configured this and it was successful thanks to this community but I still had to piece it together here and some from documentation but was never able to find a ste...

Show results in replies (1)

03-19-20 Module Core Service high cpu and ram usage by Komposten in LiveSafe

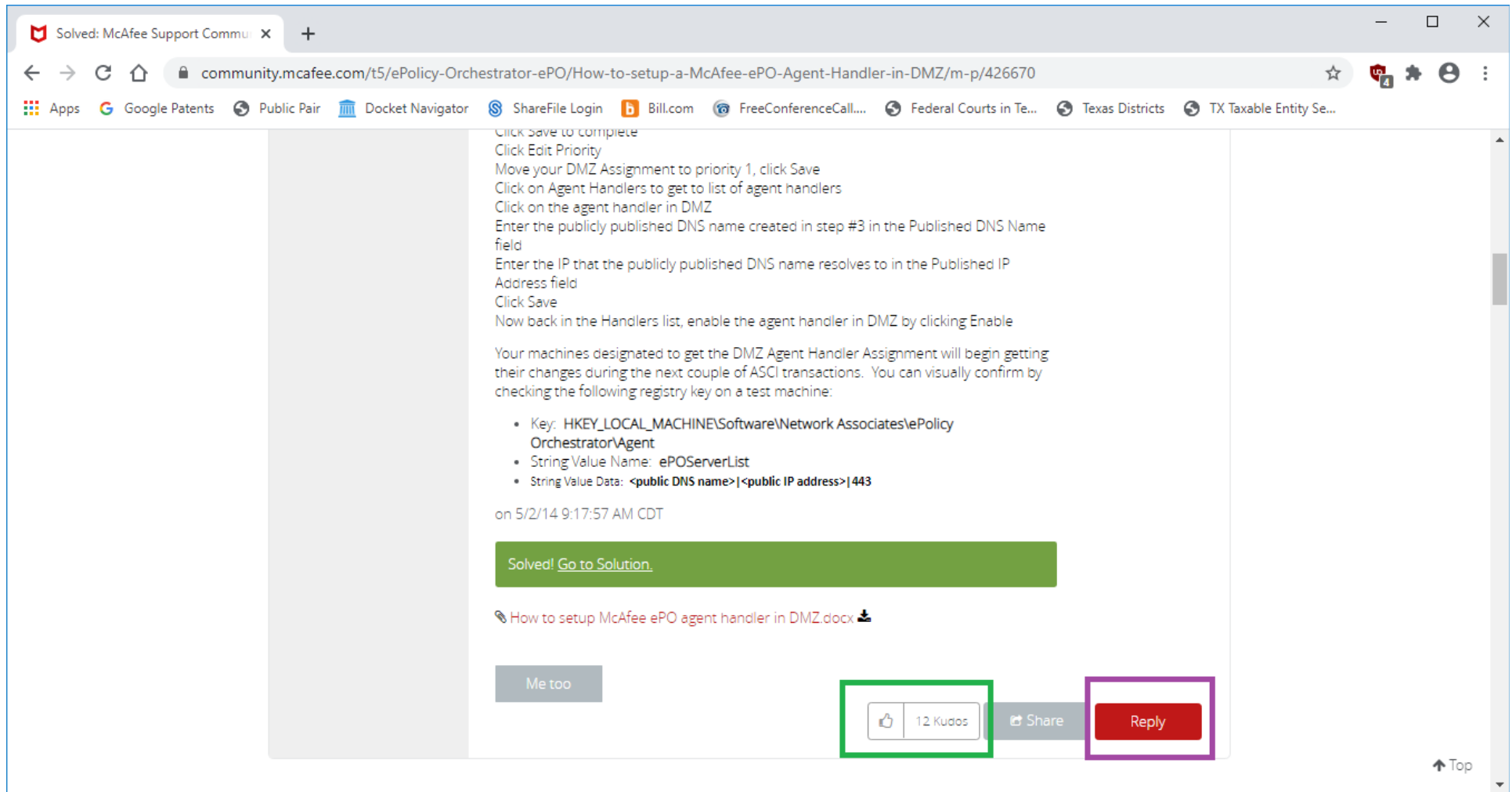
Hi! Not sure if this is related to the McAfee Management Service host - VERY HIGH CPU USAGE issue, hence posting in a new thread. So, today McAfee started acting out all weird. Randomly when p...

Tags: high cpu high ram MCAfee DONT CARE module core service NOT SOLVED STILL WAITING windows 10

Show results in replies (1)

https://community.mcafee.com/t5/forums/searchpage/tab/message?filter=acceptedSolutions,solvedThreads&solution=true&advanced=true&solved=true&sort\_by=-topicKudosCount&collapse\_discussion=true&search\_type=thread#

[https://community.mcafee.com/t5/forums/searchpage/tab/message?filter=acceptedSolutions,solvedThreads&solution=true&advanced=true&solved=true&sort\\_by=-topicKudosCount&collapse\\_discussion=true&search\\_type=thread](https://community.mcafee.com/t5/forums/searchpage/tab/message?filter=acceptedSolutions,solvedThreads&solution=true&advanced=true&solved=true&sort_by=-topicKudosCount&collapse_discussion=true&search_type=thread) (this is the same webpage as the above, but with the mouseover shown for sort)



<https://community.mcafee.com/t5/ePolicy-Orchestrator-ePO/How-to-setup-a-McAfee-ePO-Agent-Handler-in-DMZ/m-p/426670> (this webpage was accessed by clicking on the first forum post shown in yellow above)

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 BASED ON INFRINGEMENT ANALYSIS OF MCAFEE  
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'636 Patent: Claim 1	McAfee
1. A computer-implemented method comprising:	Defendant's e-commerce website provides an automated, or computer-implemented, method for users to write and/or rate forum posts by clicking one or more buttons. Such posts may be sorted by "Kudos". This is shown by the above screenshot(s).
a computer system storing items of information in a database, wherein the items are received from a first set of two or more of a plurality of remote computer systems coupled to the computer system via a computer network;	<p>On information and belief, Defendant utilizes a computer system to host Defendant's e-commerce website and to store items of information, such as posts, in a database. As shown on Defendant's website, the items (i.e., posts) are received from a first set of two or more of a plurality of remote computer systems (i.e., two or more users utilizing web browser software on respective computing devices) coupled to Defendant's computer system via a computer network (i.e., the Internet).</p> <p>The above screenshot(s) shows two user posts (boxed in yellow), which, on information and belief, were received by Defendant's computer system, via the Internet, from two different users (boxed in orange) utilizing two respective user devices of a population of user devices accessing Defendant's website (i.e., "two or more of a plurality of remote computer systems coupled to the computer system via a computer network"). On information and belief, the users submitted their posts by selecting a button similar to the button boxed in purple in the above screenshot(s).</p>
the computer system receiving, via the computer network, submissions regarding two or more particular ones of the stored items of information, wherein each submission is received from a corresponding one of a second set of two or more of the plurality of remote computer systems, wherein each of said submissions includes	On information and belief, Defendant's computer system receives, via the computer network (i.e., via the Internet and via its website), submissions regarding two or more particular ones of the stored items of information (i.e., two or more particular stored posts), wherein each submission is received from a corresponding one of a second set of two or more of the plurality of remote computer systems (i.e., two or more user devices utilizing web browser software on respective computing devices of the population of user devices accessing Defendant's website), wherein each of said submissions includes a rating and/or a comment (i.e., at least one rating or one comment) regarding a corresponding one of the stored items (i.e., a post of the two or more stored posts) that has been transmitted to the corresponding remote computer system via the computer network by the computer system (i.e., sent to a

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<p>a rating and/or a comment regarding a corresponding one of the stored items that has been transmitted to the corresponding remote computer system via the computer network by the computer system;</p>	<p>corresponding user device, of the two or more user devices, via the Internet by Defendant's computer system to be displayed via a web browser, for example).</p> <p>The above screenshot(s) shows two user posts (boxed in yellow), which are, on information and belief, stored by Defendant's computer system (i.e., "two or more particular ones of the stored items of information"). Defendant's computer system received submissions for each of these two posts, and each submission included a rating and/or comment, as indicated by the content inside the green boxes.</p> <p>For example, Defendant's website displays that Defendant's computer system received submissions regarding "kudos" for the posts, as boxed in green. On information and belief, submissions associated with the posts were received from two or more user devices (i.e., the submissions were received from a corresponding one of a second set of two or more of the plurality of remote computer systems) via the Internet (i.e., the computer network). On information and belief, to facilitate the submissions, the stored posts were transmitted to the two or more user devices (i.e., two of the plurality of remote computer systems) by Defendant's computer system via the Internet (i.e., transmitted via the computer network by the computer system) (e.g., for display via a web browser).</p>
<p>the computer system storing the received submissions in the database;</p>	<p>On information and belief, Defendant's computer system stores received ratings and/or comments (i.e., submissions) in the database, as each rating and/or comment is associated with and displayed with its respective post, as shown in the above screenshot(s) where the ratings boxed in green are associated with each post boxed in yellow.</p>
<p>the computer system receiving a request from a given one of the plurality of remote computer systems to view a listing of the stored items of information according to an ordering consistent with a selected criterion that</p>	<p>Defendant's computer system facilitates the receiving of requests from a given one of the plurality of remote computer systems (i.e., a user device of the population of user devices requesting to view and/or access Defendant's website) to view a listing of the stored items of information (i.e., the posts) according to an ordering consistent with a selected criterion that pertains to the stored submissions (i.e., sorted by a criterion pertaining to the ratings and/or comments).</p>

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<p>pertains to the stored submissions; and</p>	<p>For example, the above screenshot(s) shows Defendant's website (i.e., of Defendant's computer system) displaying a list of posts (i.e., a listing of the stored items of information), shown boxed in yellow. The displayed posts may be sorted by "Kudos," as indicated by the selection that is boxed in red (i.e., selected criterion) in the dropbox labeled "Sorted by." This sorting criterion pertains to the stored ratings (i.e., stored submissions) associated with each post (i.e., sorting is based on "kudos" ratings). Therefore, the posts are listed "according to an ordering consistent with a selected criterion that pertains to the stored submissions." This list of posts was requested by a user device (i.e., a remote computer system) when the user device requested to view and/or access Defendant's website.</p>
<p>responsive to the request, the computer system providing a first set of data to the given remote computer system, wherein the first set of data is usable on the given remote computer system to display said listing of the stored items according to said ordering.</p>	<p>Defendant's website received the request from the given remote computer system (i.e., user device) to access Defendant's website. Responsive to the request, Defendant's computer system served the first set of data (i.e., the website) to the given remote computer system. The first set of data is usable on the given remote computer system to display said listing of the stored items (i.e., the website data is used to display the posts on the user device) according to said ordering (i.e., sorting).</p> <p>As shown in the above screenshot(s), in response to the user device request to access and view Defendant's website, Defendant's computer system provided the user device with data comprising Defendant's website that is usable by the user device to display content of Defendant's website (i.e., a first set of data usable on the given remote computer system to display the website). Defendant's website displays a listing of posts, boxed in yellow, which are sorted by "Kudos," as indicated by the selection that is boxed in red (i.e., selected criterion) in the dropbox labeled "Sorted by." This sorting criterion pertains to the stored ratings (i.e., stored submissions) associated with each post. Therefore, Defendant's website displays said listing of posts according to said ordering, which is consistent with a selected criterion that pertains to the stored submissions.</p>



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Claim 4	Accused Instrumentalities
4. The method of claim 1, wherein the database includes an extensible hierarchy of information categories, wherein the method further comprises permitting said given remote computer system to navigate through the extensible hierarchy.	<p>On information and belief, Defendant's database includes an extensible hierarchy of information categories, wherein the method further comprises permitting said given remote computer system (i.e., a user device) to navigate through the extensible hierarchy.</p> <p>As shown boxed in brown in the above screenshot(s), Defendant's website includes a hierarchy of information categories. Each category is clickable by a user to navigate through posts associated with information pertaining to each category. On information and belief, the hierarchy is extensible in that Defendant may add or remove information categories to simplify the website and/or user navigation.</p>

Claim 5	Accused Instrumentalities
5. The method of claim 4, wherein the request is received from the given remote computer system after receiving information from the given remote	Defendant's website may receive the request from the given remote computer system (i.e., the user device) to view the listing of the stored items of information (i.e., the posts) after receiving information from the given remote computer system (i.e., the user device) indicating that a user of the given remote computer system (i.e., the user device) has elected to navigate to a particular one of the information categories within the extensible hierarchy, wherein said stored items of information (i.e., the posts) are associated with the particular information category.

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<p>computer system indicating that a user of the given remote computer system has elected to navigate to a particular one of the information categories within the extensible hierarchy, wherein said stored items of information are associated with the particular information category.</p>	<p>As described above, Defendant's database includes an extensible hierarchy of information categories that a user of a given remote computer system (i.e., a user device) may navigate. As described above, a user may navigate the hierarchy by clicking a category such as one of those boxed in brown in the above screenshot(s).</p> <p>For example, a user may have clicked the categories "in accepted solutions" and "solved," boxed in brown, on a previous webpage, to arrive at the webpage with posts ("stored items of information") shown in the screenshot(s). The posts shown in the screenshot(s) are associated with these categories.</p>
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Claim 8	Accused Instrumentalities
<p>8. The method of claim 1, wherein the computer system maintains at most one rating per contribution source for any given one of the stored items of information.</p>	<p>On information and belief, Defendant's computer system maintains at most one rating per contribution source (i.e., user) for any given one of the stored items of information (i.e., posts).</p> <p>As shown in the above screenshot(s), and as described above with respect to claim 1, ratings are boxed in green. On information and belief, a user may submit at most one rating per post (i.e., by clicking a button boxed in green). Therefore, on information and belief, Defendant's computer system also maintains at most one rating per user ("contribution source") per post ("any given one of the stored items of information").</p>

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Claim 9	Accused Instrumentalities
<p>9. The method of claim 1 further comprising: controlling said receiving and said storing of the submissions to prevent a given contribution source from rating a given one of the stored items of information more than once.</p>	<p>Defendant's computer system controls said receiving and said storing of the submissions (i.e., ratings) to prevent a given contribution source (i.e., user) from rating a given one of the stored items of information (i.e., posts) more than once.</p> <p>As shown in the above screenshot(s), and as described above with respect to claim 1, ratings are boxed in green. A user may submit at most one rating per post (i.e., by clicking a button boxed in green). Therefore, Defendant's computer system controls the receiving and the storing of ratings ("submissions") to prevent a user ("given contribution source") from rating a post ("a given one of the stored items of information") more than once.</p>

**Caveat:** The notes and/or cited excerpts utilized herein are set forth for illustrative purposes only and are not meant to be limiting in any manner. For example, the notes and/or cited excerpts, may or may not be supplemented or substituted with different excerpt(s) of the relevant reference(s), as appropriate. Further, to the extent any error(s) and/or omission(s) exist herein, all rights are reserved to correct the same.